

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

43 West 43rd Street, Suite 131
New York, New York 10036
Phone: 212-725-9800
Facsimile: 212-500-5115

Email: info@osbornlawpc.com
www.osbornlawpc.com

January 20, 2022

VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

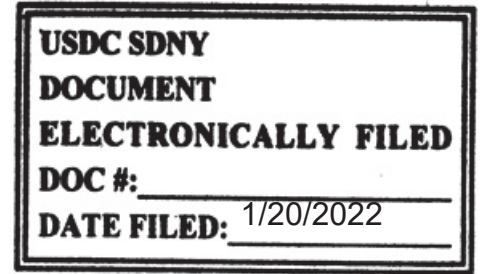
Re: *Ramirez v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-10766-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Judith Ramirez, and with the consent of the defendant, to request an extension of all deadlines in the Court's February 4, 2021 Scheduling Order. This is plaintiff's third request for an extension of time. This request is necessitated by the twelve briefs due to be filed by our office within the next two weeks.

Subject to the approval of the Court, the parties propose the following revised briefing schedule, including events already passed:

- a. On October 20, 2021, Plaintiff served a written proposal for settlement on counsel for the Commissioner summarizing Plaintiff's strongest arguments;
- b. On November 22, 2021, the Parties electronically filed a joint letter advising the Court that the parties are unable to resolve the case and are proceeding to brief their respective positions;
- c. If the Parties have not agreed to dismiss, remand or otherwise resolve the case, Plaintiff to file her motion for judgment on the pleadings on or before **February 17, 2022**;



Honorable Robert W. Lehrburger
January 20, 2022
Page 2

- d. Defendant to file its response/cross-motion on or before **April 18, 2022**; and
- e. Plaintiff to file her reply (if any) on or before **May 9, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Mary Ellen Brennan, Esq. (by ECF)

Extension granted.

SO ORDERED:



1/20/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE